



# NRM Regions Australia Submission on Replanting Native Forest and Woodland Ecosystems method

October 2024

Thank you for the opportunity to make a submission on the proposed Replanting Native Forest and Woodland Ecosystems method for the Nature Repair Market.

NRM Regions Australia welcomes the opportunity to make a submission on the Replanting Native Forest and Woodland Ecosystems method. Our responses highlight opportunities for regional NRM organisations to contribute to planning and delivering nature repair projects that help meet additional government objectives.

We wish to draw your attention to the tight timeframes for the consultation on the method, and Nature Repair Market consultation in general. The consultation on this method comes immediately after the consultation on the Nature Repair Market Rules, and simultaneously with the consultation on the Biodiversity Assessment Instrument (BAI) and the Ecological Knowledge Systems (EKS) report. Given the importance of the method, the BAI and the EKS to the operation of the Nature Repair Market, and the detail and complexity involved, there would be value in providing further opportunity for consultation ahead of finalisation of these key pieces of work.

1. Are there any specific approaches applied in the method that you agree with?; Yes / No;

1.a Why or why not?

- NRM Regions Australia welcomes the references to regional NRM organisations in relation to identifying the optimal growing season to support the plantings (pp 41, 42)
- We note that regional NRM plans could be used to inform the design and development of projects under this method, inclusive of identifying threats, hydrological features of significance, threatened species and communities, disturbance and land use history

2. Are there any specific approaches applied in the method that you do not agree with? Yes / No; 2.a Why or why not?; 2.b What do you think would be a better approach in the areas that you do not agree with?

NRM Regions Australia provides the following suggestions to improve the method.

**Clarify the definition of ‘suitably qualified person’**

- The proposed method requires site assessments to be conducted by a ‘suitably qualified person’, defined as a person with a qualification in ecology, botany or equivalent field, at least 3 years working experience, and recent working experience (see Appendix A).
- Whilst ecological principles are the same across landscapes, it is important that projects are developed by experts with working knowledge of the local ecological context - for both environmental outcomes and market integrity.
- Extending the definition of ‘suitably qualified person’ to include a minimum requirement for practise in the ecosystem type they are assessing would help address this issue.

**Provide a definition of ‘woodland’ within the method.**

- ‘Forest potential’ is currently defined as trees with potential to provide a minimum 20% crown cover, and ‘forest’ with a note that ‘some native vegetation communities that are called woodlands fit this definition’ (see Appendix A).
- However ‘woodland’ has not been specifically defined, and can include ecosystems that would naturally achieve less than 20% crown cover.
- Including a definition for ‘woodland’ within the method would help clarify crown cover requirements, and ensure that tree planting density reflects the reference ecosystem.

**Provide a definition of ‘native woody vegetation’**

- The method refers to ‘native woody vegetation’, however this is not currently defined.
- Including a definition for ‘native woody vegetation’ will help clarify the intent of the method

**Clarify which ‘Vegetation Groups’ are eligible under this method.**

- Some of the Vegetation Groups listed in Table 3 (see section 6.4) are less than 20% crown cover. This includes Grassy eucalypt woodland, Mangroves and saltmarsh, and the grassland Vegetation Groups.
- If the intent of the method is to only include areas that meet the ‘forest potential’ definition, then these other Vegetation Groups need to be removed or clarified.
- Alternatively, a broader definition that includes these Vegetation Groups within this method could be incorporated into the method, given how critical these Vegetation Groups are in halting and reversing the decline of biodiversity by 2030.

### **Provide a definition of a climate adapted or adjusted reference ecosystem.**

- The definition of 'reference ecosystem' includes 'an adjusted reference ecosystem, which accounts for irreversible environmental changes such as climate change' (Appendix A).
- Identifying an appropriate 'adjusted reference ecosystem' will be important for ensuring effective ecological outcomes.
- Guidance for site assessors will be important here. This could be achieved through a review by a 'suitably qualified person', similar to the proposed 'Reforestation by Environmental and Mallee Plantings' ACCU method.

### **Remove the '5 km radius' from the 'reference ecosystem' assignment process or enable a 'suitably qualified person' to vary this as appropriate.**

- Section 6.3.1 outlines the process for assigning the reference ecosystem, with a provision for situations where the vegetation mapping is incorrect, and an alternative reference ecosystem is needed.
- At present the method requires that the alternative reference ecosystem must be within a 5 km radius, though it is possible that a suitable alternative may not fall within that boundary.
- We suggest this requirement be amended to: "occur within a 5 km radius of the activity area' or 'be a suitable alternative native vegetation type identified by a suitably qualified person'; and be the native vegetation type that was most likely present on the land prior to clearing (or pre-1750).

### **Consolidate the definitions in Section 3 and the Appendix**

- Definitions are currently included in two sections of the method – in Section 3 and the Appendix.
- To avoid confusion and duplication, it would be better to combine these sections into one.

### **Clarify project plan review and update requirements**

- NRM Regions Australia supports the provision for review and variation of project plans through the life of the project (8.1). This will enable adaptive management and response to changing project conditions.
- It is not presently clear within the method who is involved in reviewing and varying the project plan. Given the direct link between the content of the project plan and on-ground activities, it would be important for any variation of the project plan to be reviewed by a 'suitably qualified person'.

### **Clarify notification requirements**

- In its current form, the method requires notification in the event of planting absences or mortality across more than 5% of an activity area (18.1)
- It is not presently clear if one or all of these three conditions listed at 18.1 must be met in order to trigger the notification requirement (i.e. mortality, disturbance to the

project area, disturbance outside the project area), though presumably it is intended to be *any* of the three conditions listed, rather than *one*.

- We suggest clarifying the notification requirements further.

3. The Committee would be particularly interested in any feedback on the following topics/sections:

3.a Cleared Land (section 5.3)

- NRM Regions Australia supports the requirement for land to have been cleared more than 7 years prior to the date of project application, or 5 years if there has been a change of ownership.
- This will help avoid perverse incentives to clear land for market participation, whilst also providing new landowners the opportunity to participate in the market.

3.b Certificate Issuance (section 16)

- Table 10 outlines the ecological indicator thresholds for certificate issuance
- Our understanding is that the native species richness targets, for both canopy and understory, are to be proponent nominated as a percentage of the reference ecosystem, varying from levels 1-4 (Source column).
- However at present - unlike non-native plant cover - there are no target level thresholds in the table for native species richness. Setting a minimum target for native species is crucial for ecological health. Our understanding of the intent of the method is for proponents to select from the composition targets in Table 7 (p29), based on this understanding we suggest these targets are reflected in Table 10.
- Is there an intent to have target levels in this table for certificate issuance (i.e. for canopy, understory etc.)?
- We also note that depending upon starting condition, some of the threshold targets are ambitious and could take a considerable amount of time to achieve- delaying the issuance of the certificate. This may impact on landholder willingness to participate in the market.

3.c Monitoring (section 13)

- Clarification is required on how regulation and compliance will work should monitoring of the project site show mixed results - e.g. if non-native groundcover targets are not met, but other requirements, such as canopy cover, are.

4. This method has been designed so it can be 'stacked' with the Australian Carbon Credit Unit (ACCU) scheme's Reforestation by Environmental or Mallee Plantings FullCAM method. The Committee would be interested in feedback on how well the method would facilitate stacking.

- It is not clear from the method as currently written that it has been designed to be 'stacked' with the 'Reforestation by Environmental or Mallee Plantings FullCAM method'
- To encourage uptake, it would be valuable to explicitly state within the method the potential for the two methods to be 'stacked'
- We also note inconsistency between the two methods on land clearing requirements. Currently, this method states 'land must have been comprehensively cleared more

than 7 years prior (or 5 years if ownership has changed), whereas the proposed Reforestation by Environmental and Mallee Plantings method states 'Plantings must be established on land that has been clear of forest cover for at least five years previously'.

5. Is the proposed method consistent with the biodiversity assessment instrument?

- No specific comment

6. Do you have any other feedback on the method?

- The place-based information developed through regional NRM planning could support the development of projects under this method that consider local environmental, economic and social contexts, whilst delivering effective environmental outcomes, avoiding perverse outcomes, and reducing risk
- This method should explicitly encourage project proponents to review the appropriate regional NRM plan and seek alignment with its objectives, wherever possible
- In addition, the Replanting Native Forest and Woodland Ecosystems method has detailed requirements for project proponents, inclusive of detailed initial site assessment reports, project plans, monitoring reports. To assist in the development of projects and provision of required information, the method would benefit from the provision of more guidance to site assessors and project proponents, for example either model templates or completed examples of the site assessment reports or project plans

#### About NRM Regions Australia

NRM Regions Australia is the national peak body of Australia's 54 regional NRM (natural resource management) organisations which cover the whole of Australia. Our members work with land managers, diverse groups and industries across the country to manage our land, water, coast, plants and animals for the benefit of people, environment and industries.

Regional NRM organisations have been leading and delivering projects that benefit biodiversity for over 20 years. Our members plan, partner, and deliver programs that support healthy and productive land, viable communities and sustainable industries. They work from the paddock to the regional scale to address issues that require a landscape perspective. This includes through informing and supporting on-ground conservation and environmental restoration programs, delivery of programs to build community capacity in NRM, and engagement with governments and other stakeholders on issues requiring a broader perspective, such as management of biosecurity risks. All regional NRM organisations have a regional NRM plan that describes the NRM priorities for that region. These plans can help provide contextual information and priorities for the region and landscape, to enhance the outcomes of projects under the Nature Repair Market.

Thank you for the opportunity to provide this submission. We would be happy to discuss these points further. Please direct enquiries to NRM Regions Australia CEO Dr Kate Andrews at [kate@nrmregionsaustralia.com.au](mailto:kate@nrmregionsaustralia.com.au) or 0403 604 823.